STATE OF CALIFORNIA

BUSINESS, TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF CORPORATIONS

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Pacific Property Assets, LLC

2600 Michelson Drive, Suite 920

Irvine, CA 92612

www.pparealestate.com

and

PPA Holdings, LLC

2600 Michelson Drive, Suite 920

Irvine, CA 92612

and

Michael J. Stewart

73 Marbella

San Clemente, CA 92673

and

John J. Packard

3 Illuminata Ln

Ladera Ranch, CA 92694

and

Chandra J. Gibson

938 Palermo Ln

Corona, CA 92879

and

Natasha Ginnaty

635 Baker St. Apartment C203

Costa Mesa, CA 92612

DESIST AND REFRAIN ORDER

(For violations of section 25110 of the Corporations Code)

The California Corporations Commissioner finds that:

1. At all relevant times, Michael J. Stewart (hereinafter referred to as "Stewart") was a founding member and principal of Pacific Property Assets (hereinafter referred to as "PPA"), a California limited liability company, and PPA Holdings, L.L.C. (hereinafter referred to as "PPA Holdings"), a California limited liability company.

- 2. At all relevant times, John J. Packard (hereinafter referred to as "Packard") was a founding member and principal of PPA.
- 3. At all relevant times, Chandra J. Gibson (hereinafter referred to as "Gibson") was the Director of Investor Relations at PPA. In that capacity, Gibson sent offering and informational materials to prospective investors.
- 4. At all relevant times, Natasha Ginnaty (hereinafter referred to as "Ginnaty") was responsible for investor relations at PPA. In that capacity, Ginnaty sent offering and informational materials to prospective investors.
- 5. Beginning in or about February 07, 2006 Stewart, Packard, Gibson, Ginnaty, PPA Holdings, and PPA offered or sold securities in the State of California, in the form of promissory notes representing interests in PPA Holdings, to California residents.
- 6. The purported purpose of the offerings is to provide general capitalization of PPA Holdings. The promissory notes are advertised as providing a 12.68% annual rate of return and as being secured by real property owned by PPA and/or PPA Holdings.

7. These securities were offered or sold in this state in issuer transactions. The Department of Corporations has not issued a permit or other form of qualification authorizing any person to offer or sell these securities in this state.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that the promissory notes representing interests in PPA Holdings, L.L.C. offered by PPA are securities subject to qualification under the California Corporate Securities Law of 1968 and are being or have been offered or sold without being qualified in violation of Corporations Code section 25110. Pursuant to section 25532 of the Corporate Securities Law of 1968, Michael J. Stewart, John J. Packard, Chandra J. Gibson, Natasha Ginnaty, PPA Holdings, L.L.C., and Pacific Property Assets, L.L.C. are hereby ordered to desist and refrain from the further offer or sale of securities in the State of California, unless and until qualification has been made under the law or unless exempt.

This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968. This order shall remain in full force and effect until further order of the California Corporations Commissioner.

Dated: October 31, 2006 Sacramento, California



PRESTON DuFAUCHARD
California Corporations Commissioner

By:

SHARON LUERAS Lead Corporations Counsel Enforcement Division